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6 *Attorney for Defendant,*
Lisa Brochu

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 SUSAN HOY, as Guardian Ad Litem for J.M.
and I.M., minors,

10 Plaintiffs
11 vs.

12 ANDREA HERNANDEZ; WALDO
HERNANDEZ; LISA BROCHU; KIM
KALLAS; LISA RUIZ-LEE; PAULA
HAMMACK; DOE Individuals I-X; ROE
CLARK COUNTY DEPARTMENT OF
13 FAMILY SERVICES EMPLOYEES XI-XX,
individually and in their official capacities;
COUNTY OF CLARK, a political subdivision
14 of the State of Nevada; and ZOE
CORPORATIONS XXI-XXX,
15

16 Defendants
17 LISA BROCHU, an individual,
18

19 Cross-Claimant
20 vs.

21 ANDREA HERNANDEZ, an individual;
WALDO HERNANDEZ, an individual; MOES
22 1-10, inclusive; and MOE CORPORATIONS
1-10, inclusive,
23

24 Cross-Defendants
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CASE No.: 2:20-cv-00103-CDS-VCF

26 **STIPULATION AND ORDER TO EXTEND
THE JOINT PRETRIAL ORDER
DEADLINE**

27 **[FIRST REQUEST]**

1 ANDREA HERNANDEZ, an individual;
2 WALDO HERNANDEZ, an individual,

3 Cross-Claimants
4

5 vs.
6 LISA BROCHU, an individual,
7 Cross-Defendant

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12 Defendant, LISA BROCHU, by and through her counsel of record, Jonathan D. Blum, Esq. of
the law firm WILEY PETERSEN, Defendants, ANDREA HERNANDEZ and WALDO
HERNANDEZ, by and through their counsel of record, Bryce Buckwalter, Esq. of the law firm
KEATING LAW GROUP (collectively, the “Defendants”), and Plaintiff, SUSAN HOY, by and
through her counsel of record, Marjorie Hauf, Esq. and Cara Xidis, Esq. of the law firm H&P LAW
(“Plaintiff”) (collectively, the “Parties”) hereby stipulate to extend the Joint Pretrial Order deadline by
thirty-one (31) days from Friday, November 3, 2023 to Monday, December 4, 2023.

13 The Parties participated in a Settlement Conference with Magistrate Judge Ferenbach on
14 October 4, 2023. The Settlement Conference was partially successful, in that some of the parties
15 reached a settlement, with only the following Defendants remaining: Lisa Brochu, Andrea Hernandez
16 and Waldo Hernandez. Since then, the remaining parties have engaged in additional settlement
17 discussions and are cautiously optimistic that a global settlement can be reached. As such, they would
18 like to avoid the time, cost and expense of preparing the Joint Pretrial Order while settlement
19 negotiations are ongoing. As such, they seek a one-month extension on this deadline.

20 This stipulated extension is for good cause, and not for improper delay.

21 DATED this 31st day of October, 2023.

22 **H&P LAW**

23 /s/ *Cara Xidis*

24 By:

25 MARJORIE HAUF, ESQ.

Nevada Bar No. 8111

26 CARA XIDIS, ESQ.

Nevada Bar No. 11743

27 8950 W. Tropicana Avenue, #1

Las Vegas, Nevada 89147

28 *Attorneys for Plaintiff*

DATED this 31st day of October, 2023.

WILEY PETERSEN

/s/ *Jonathan Blum*

By:

JONATHAN D. BLUM, ESQ.

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Attorneys for Defendant, Lisa Brochu

1 **KEATING LAW GROUP**

2 */s/ Bryce Buckwalter*

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5 9130 W. Russell Road, Suite 200
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10 *Attorneys for Defendants, Andrea Hernandez*
11 *and Waldo Hernandez*

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14 **ORDER**

15 Based on the parties' stipulation to extend the joint pretrial order deadline by 31 days (from
16 November 3, 2023 to December 4, 2023), IT IS HEREBY ORDERED that the deadline for filing the
17 joint pretrial order is extended to December 4, 2023.

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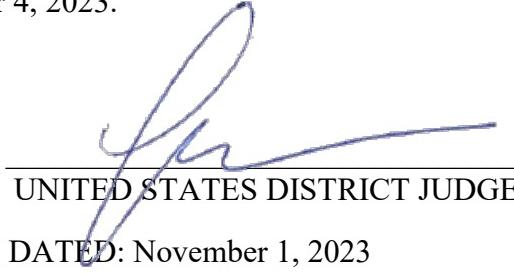
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15 UNITED STATES DISTRICT JUDGE

16 DATED: November 1, 2023